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November 18, 2024

VIA ECF

Honorable Denise L. Cote
United States District Judge
Southern District of New York
500 Pearl Street, Room 1910
New York, NY 10007

Grant
Yvonne L. K.
11/14/24

RE: *Skillz Platform Inc. v. Papaya Gaming, Ltd., et al.*, No. 1:24-CV-01646-DLC

Dear Judge Cote:

Pursuant to Rule 8.B of Your Honor's Individual Practices, we write on behalf of Papaya Gaming, Ltd. and Papaya Gaming, Inc. (collectively, "Papaya") concerning Papaya's letter requesting a discovery conference to address the refusal of Skillz Platform, Inc. ("Skillz") to provide highly relevant information in discovery.

Skillz has taken the position that "[c]ertain information related to matchmaking practices on Skillz's mobile gaming platform constitutes confidential trade secrets and must be filed under seal." ECF No. 108. The Court authorized Skillz to file that motion under seal and to file a public version redacting the asserted "trade secrets." ECF No. 111. Several exhibits to Papaya's Letter Motion contain references to these "trade secrets." In addition, Skillz has labeled two exhibits, Exhibits 3 and 8, as HIGHLY CONFIDENTIAL – OUTSIDE COUNSEL'S EYES ONLY pursuant to the Protective Order filed in this case. ECF No. 39.

To comply with the Protective Order and the sealing Order, and while reserving all rights, Papaya seeks leave to (1) file Exhibits 1-2 and 4-6 under seal and file public versions redacting language that Skillz has designated as "trade secrets"; and (2) file under seal Exhibits 3 and 8.

Respectfully submitted,

/s/ Anthony J. Dreyer

Anthony J. Dreyer

cc: Counsel of record (by ECF)